

PATRICK E. STOCKALPER, SBN 156954  
MOLSHREE GUPTA, SBN 275101  
KJAR, MCKENNA & STOCKALPER, LLP  
841 Apollo Street, Suite 100  
El Segundo, California 90245  
Telephone (424) 217-3026  
Facsimile (424) 367-0400  
pstockalper@kmslegal.com  
mgupta@kmslegal.com

Attorneys for Defendants,  
**COUNTY OF LOS ANGELES and DEPUTY TRAVIS KELLY**  
*(Defendants is exempt from filing fees pursuant to Government Code § 6103)*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JOSHUA ASSIFF,

Plaintiffs,

v.

COUNTY OF LOS ANGELES;  
SHERIFF DEPUTY BADGE  
NUMBER 404532; And DOES 1  
through 10,

Defendants.

**Case No.: 2:22-cv-05367 RGK(MAAx)**

**OBJECTION TO THE NOTICE OF  
TAKING DEPOSITION OF  
DEFENDANT COUNTY OF LOS  
ANGELES**

Action Filed: August 3, 2022  
Pretrial Conference: July 10, 2023  
Trial Date: July 25, 2023

Assigned to:  
Hon. R. Gary Klausner, District Judge  
Courtroom 850

All Discovery Matters Referred to:  
Hon. Maria A. Audero, District Judge

**TO ALL PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that pursuant to California Code of Civil Procedure § 2025.410, Defendants, COUNTY OF LOS ANGELES and DEPUTY TRAVIS KELLY hereby object to the Notice of Taking Deposition of COUNTY OF LOS ANGELES, set for April 26, 2023 at 10:00 a.m. served by Claimants via electronic mail on March 31,

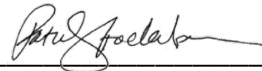
2023, on defense counsel. The objection to the deposition is made on the following grounds:

1. Defendants object to the date, time, and location of the deposition on the grounds that it was unilaterally selected by counsel for Plaintiff without first verifying the availability of defense counsel and the witness. As neither the deponent nor counsel for Defendants are available to proceed on April 25, 2023, the deposition will need to be rescheduled for a date and time convenient to all counsel and to the deponent. Plaintiff is requested to contact counsel for Defendants to coordinate a mutually convenient date, time and location for the deposition. Defendants and counsel are not available as noticed.

Dated: April 18, 2023

KJAR, MCKENNA & STOCKALPER, LLP

By:



PATRICK E. STOCKALPER

MOLSHREE GUPTA

Attorneys for Defendants,

COUNTY OF LOS ANGELES and DEPUTY  
TRAVIS KELLY

**CERTIFICATE OF SERVICE**

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 841 Apollo Street, Suite 100, El Segundo, California 90245.

On April 18, 2023, I served the foregoing document described as **OBJECTION TO THE NOTICE OF TAKING DEPOSITION OF DEFENDANT COUNTY OF LOS ANGELES** on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

**SEE ATTACHED SERVICE LIST**

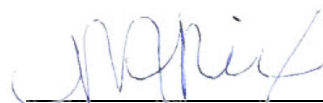
**By Mail** I caused such envelope(s) to be deposited in the mail at El Segundo, California. The envelope was mailed with postage thereon fully prepaid and addressed to the parties listed on the Service List. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

XX **By Email** Based upon a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in the Service List. My email address is [mnixon@kmslegal.com](mailto:mnixon@kmslegal.com).

**By Personal Service** I caused such document to be Personally Served on the parties listed in the Service List.

XX **State** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 18, 2023, at El Segundo, California.



Maria Nixon

**SERVICE LIST**

**Assiff, Joshua vs. County of Los Angeles, et al.**

Central District- Case No.: 2:22-cv-05367 RGK(MAAX)

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|---|---|
| Thomas M. Ferlauto, Esq.<br>Law Office of Thomas M.<br>Ferlauto, APC<br>25201 Paseo de Alicia, Ste. 270<br>Laguna Hills, CA 92653<br>EM: <a href="mailto:tmf@lawofficetmf.com">tmf@lawofficetmf.com</a> | Attorney for Plaintiff,<br><b>JOSHUA ASSIFF</b> |
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